

STICKNEY AVENUE LANDFILL AND TYLER STREET DUMP SITES
TOLEDO, OHIO
RESPONSES TO 104(e) REQUEST LETTER DATED AUGUST 12, 1993

EPA Region 5 Records Ctr.



340238

<u>RES. NO.</u>	<u>PRP RESPONDENT</u>	<u>RESPONSE</u>
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Notice

AP Parts Manufacturing Company
P. O. Box 965
Toledo, OH 43697

1. Lawrence Beaudry, Maintenance Superintendent; Henry Beard, Engineering Mgr.; Benjamin Brenneman, Plant Mgr.; Dale Fandrey, Industrial Engr. - Time Study; Charles Frederick, Production Worker; Edward McCormick, Purchasing Agent; Penny Martinson, Employee Relations; Thomas Pisula, Gen. Foreman - Production; and John Ziegler, V.P. - Finance.
3. William Anderson, Warehouse Mgr.; John Grindle, Facilities Mgr.; Ted Kettle, Plant Supt.; Warren King, Asst. Plant Mgr.; Ralph Lingg, Plant Mgr.; John Smith, Gen. Foreman (all former employees whom they have been unable to contact).
4. OHD 011 323557.
6. AP's general trash was picked up by the City of Toledo or its contractors.
- 7 b. AP's trash was picked up on a weekly basis.
- 7 c. AP's trash consisted of waste office paper and sweepings, packaging materials, welding slag and waste filter media.
- 7 d. AP was the owner of these wastes.
- 7 g. City of Toledo or its contractors selected the dump site.
- 7 h. Payments to City of Toledo were made in the normal course of AP's processing of accounts payable.
- 7 i. AP had no intentions concerning where thrash was to be dumped.

- 7 m. AP took no measures to determine how its waste was disposed of.
- 7 n. The waste was placed in dumpsters at AP's facility and then emptied by the City of Toledo at time of pickup.
- 7 q. See responses to Requests 1 and 3, above.
8. It has been alleged that some of AP's waste was taken to Dura Landfill.

Acklin Stamping Company
1925 Nebraska Avenue
Toledo, OH 43607

Acklin reserves right to amend this information in the future. Objects, as information sought exceeds authorized scope of inquiry and portions are irrelevant.

1. Bernie Stone, Phil Wood, Dick Gibbons, Bob Braunschweiger and W. Bruce McCuaig, Corp. Dir. of Environmental Control.
2. - 3. Acklin is a Division of Tecumseh Products Company, who is unaware of any relevant documentation or additional persons.
4. OHD0005049689.
6. - 8. To the best of Tecumseh's knowledge, Acklin never sent hazardous waste to Stickney/Tyler. Acklin used Community Sanitation, Cousins Industrial Waste Removal and BFI to haul its waste, but doesn't know where they took it.

check Dura 104(G)

Allied-Signal Inc.
Engineered Materials Sector
101 Columbia Road
Morristown, NJ 07962-1057

1. - 3. David A. Paley, Mgr., Site Remediation personally examined all existing information and documents sought by EPA.
4. Detroit Coke Corp. ID# MID005517198; Plaskon Site, Toledo ID number is unknown.
8. Allied-Signal objects that this request is overly broad and beyond the scope authorized by statute, but nonetheless refers you to its 104(e) response filed with respect to the Dura Site.

all under 104(e)'s

not enough to notice unless Frank gets info from interviews

- Browning-Ferris Industries of Ohio and Michigan, Inc. ("BFIOM")**
1301 Alexis Road
Toledo, OH 43617
- and
6233 Hagman Road
Toledo, OH 43624
- BFIOM unable to provide a notarized affidavit due to the passage of time and departure of knowledgeable employees. All responses are the recollections of current employees. Direct all future correspondence to ~~their~~ ^{Company's} attorney, Robert L. Gulley. BFIOM's corporate headquarters is in Houston, Texas.
1. BFIOM lists 16 persons whom they request be contacted through their counsel, Robert L. Gulley, Sr. Environmental Counsel, P. O. Box 3151, Houston, TX 77253, telephone: (713) 870-7694.
 2. Accounts Payable records, customer files, various purchase receipts, corporate documents, contracts, correspondence, accounting and financial records, customer lists of the haulers Community Sanitation Service ("CSSI"), Ter-Mar, Inc. and S. E. Freeman & Sons Cartage, Inc. Also files and interview notes of former CSSI employees taken in anticipation of litigation. (BFIOM objects to producing these as they are privileged attorney-client documents.) Non-privileged documents available upon request.
 3. CSSI did transport waste to the Sites, and six of their former employees are listed. Burton Sanitation, Benton Sanitation and Waste Management, Inc. ("WMI") also used the Sites.
 4. MID985610989 (Central Michigan), MID058732788 (Toledo), MID058732788 (Vienna Junction), and MID058732788 (Great Lakes Medical). ^{ask Frank to interview}
 6. BFIOM never used the Sites and denies any liability for same. BFIOM simply purchased some of the assets of CSSI, Freeman and Ter-Mar but did not acquire the liabilities of these Companies. Donald Smith a former CSSI employee presently with BFIOM may be able to provide information regarding CSSI's use of the Tyler Site. Harry Heldt presently with BFIOM used to work for Barton, Benton and WMI; and he recalls hauling waste to Stickney and Tyler when he worked for them. They are to be contacted through BFIOM's counsel. Other haulers who may have used the Sites are: A.W. Stevens, O'Dell Lonsway, R & K Sanitation and Barry Cousins Refuse Service.
 7. BFIOM never used the Sites. They believe WMI may be the successor-in-interest to Barton and Benton.

- 7 a. Harry Heldt advised that CSSI's customers included Kaiser Aluminum, Champion Spark Plugs, Dana Corp., DeVilbiss Industrial Products, Dupont, Dura Corp., Jeep AMC and Spicer Corp. He saw CSSI dumping at the Sites while he was working for both Barton and Benton. Donald Smith recalls that CSSI customers included Champion Spark Plugs, Driggs Dairy, Pinkerton Tobacco, Roberts Rubber, Sofo Cheese and White Hut.
- 7 b. CSSI and Benton hauled to Stickney during mid to late 1960's for approximately one year and hauled to Tyler from 1963 to 1967. Barton also used Tyler from 1963-67. WMI acquired Benton in Jan. 1972 and continued to use Tyler until 1974 when WMI opened its own landfill. In early 1970's, WMI took over from CSSI the Jeep AMC and Kaiser accounts and hauled their waste to the Tyler Site.
- 7 c. According to Mr. Heldt, Champion made spark plugs, Spicer made transmissions, Dana made automobile and transmission parts, Dura made transmission parts, Dupont made paint, DeVilbiss made atomizers and paint spray guns, Jeep AMC made Jeep cars and trucks, Kaiser made paint for aluminum siding and generated drums of liquid that were disposed of at Stickney/Tyler by CSSI. Barton transported commercial waste to Tyler.
- 7h & o. During the 1960s and early '70s, there was no exchange of paperwork at either Site. Taxpayers indirectly paid for the disposal through their taxes to the City of Toledo.
- 7 n. None, other than the drums allegedly generated by Kaiser Aluminum.
- 7 q. Harry Heldt and Donald Smith, both now with BFIOM.
8. Objects. Information is not relevant and CERCLA does not require them to provide this.

Buckeye Brewing Corp.
c/o Miller Brewing Company
3939 W. Highland Blvd.
Milwaukee, WI 53201

Miller Brewing sent nothing to these Sites nor had any relationship with Buckeye during 1951 - 1981. Miller purchased certain assets of Meister Brau, Inc. in 1972 including the trademarks and tradenames of Buckeye. Miller never owned or had any control over either Meister Brau or its subsidiary Buckeye.

Bulk Materials, Inc.
6500 Pearl Road
Cleveland, OH 44130

Bulk's attorney is submitting this response on behalf of Refiners Transport & Terminal Corporation, a wholly-owned subsidiary of Bulk. From 1951 to 1968, Refiners operated a truck terminal at 2120 Front St., Toledo, OH. Since 1968, they have operated at Ohio Route 2 & Route 280 in Toledo. Refiners was purchased by Leaseway Transportation Corp. in 1965. In 1989, Leaseway sold Refiners to Bulk.

1. Jack Golan, V.P.- Sales, telephone: (419)693-2828.
 2. A review of Refiners' records produced nothing that was responsive.
 3. Documents concerning Refiners prior to Feb.28, 1989 may be in the possession of Leaseway Transportation Corp.
 4. OHD000720102.
- 6 & 7c. Refiners engaged in washing the interior of bulk tank trailers during 1951 to 1981. Washwater was placed into a settling tank, filtered, and discharged into the local sewer system. Periodically, sludge from the washwater settling tank was pumped out and shipped off-site for disposal. About 2 to 3 drums of sludge was removed 3 or 4 times a year. Refiners' bulk tank trucks hauled paint feedstock for DuPont, caustics, acids, resins, varnishes, lacquers, glues, formaldehyde, lubricating oils and asphalt.
- 7 d. Refiners owned its waste sludge until it was accepted for disposal by an unidentified disposal company.
- 7 e. Each shipment consisted of two to three 55-gallon drums of sludge - total quantity unknown.
- 7 g. Refiners did not select the disposal site. Presumably, this was done by the disposal company.
- 7h & o. Approximately \$25 to \$30 per drum was paid to the disposal company. No records exist of these transactions.
- 7 n. Sludge was transported in unmarked 55-gallon drums. The drums may have been marked by the waste hauler.

Bunting Bearings Corp.
1001 Holland Park Blvd.
Holland, OH 43528

Bunting was not in existence from 1950 to 1980. Bunting became incorporated in 1988.

Notice

Chevron U.S.A. Inc.
575 Market Street
San Francisco, CA 94105

Gulf Oil Corporation merged with Chevron on 7/1/85. So far, there is nothing to link either Gulf or Chevron to Stickney/Tyler.

*Gulf mentioned
by Morawski*

1. Donald F. Gilson, Jr., of Chevron; Christopher E. Larsen, Chevron; Harlan Failer, Gulf retiree; Ken Balsmeyer, Gulf retiree.
2. Gulf memo of 5/24/70 listing disposal companies and sites used by Gulf Toledo Refinery and list dated 1/20/89 showing documented transporters and sites used by Gulf marked with an asterisk, both attached as Exhibit A.
4. EPA Generator ID No. for Gulf Toledo Refinery: OHD-002901866.
8. Objects that this request is overly broad, burdensome and exceeds EPA's authority. Nonetheless, they list 17 sites of transporters that may have been used by Gulf Toledo Refinery.

Notice

Champion Spark Plug Co.
900 Upton Avenue
Toledo, OH 43607

Cooper Industries answers on behalf of Champion, one of their Divisions. A reasonable search of Company records has turned up nothing linking Champion to the Sites.

*Champion mentioned
by Morawski.*

1. Thomas L. Oess, Mgr. of Purchasing; Terry E. Rife, Mgr. Environmental & Corp. Services of Champion; Willette A. Lemelle, Legal Asst. Environmental of Cooper.
3. Robert Textor, Purchasing Dept. of Champion.
4. Champion's EPA ID No. is OHD005043443.
5. Cooper denies its acts caused any damage.
8. During 1951 to 1981, Champion's wastes were taken to King Road.

Notice:

Send another
104 - Transporter
- subsidiary

Community Sanitation Service, Inc. Browning-Ferris Industries, P. O. Box 3151,
Box 5069, Point Place Station
Toledo, OH 43611

Houston, TX 77253 received EPA's letter to
C.S.S.I. since Browning-Ferris Industries of
Ohio and Michigan, Inc. now operates a

hauling facility and landfill using the Box 5069 address, above. BFIOM is not
C.S.S.I. BFIOM originally incorporated as CSS, Inc. on 6/24/71. On 7/13/71,
CSS, Inc. purchased certain assets from Community Sanitation Service, Inc., S.E.
Freeman & Sons Cartage, Inc. and Ter-Mar, Inc. BFIOM never owned or acquired
stock in any of these entities, nor did it assume any of their liabilities. The
Ohio Secretary of State indicates that C.S.S.I. which began business in 1951 is
still in good standing as of Sept. 1993. BFIOM will forward a copy of an
updated Certificate of Good Standing for C.S.S.I. to EPA shortly. Contact
Robert L. Gulley, Sr. Environmental Counsel for Browning-Ferris Industries for
help in arranging interviews with former C.S.S.I. employees identified in
BFIOM's own 9/15/93 response.

Let go for now.
10/28/93

Continental Aviation
Continental Airline Holdings, Inc.
2929 Allen Parkway, Suite 2010
Houston, TX 77019

Continental Airlines, Inc. does not now, nor
did they ever own or operate under the name
Continental Aviation and therefore should not
be on our list.

Notice?

Cousins Ind. Waste Removal Co.
1801 E. Matzinger Road
Toledo, OH 43612

Send another 104(e)
Transporter.

be nasty.

1. Barry A. Cousins
2. They have no documentation to indicate they were a party to these landfills.
4. They are a hazardous waste transporter - EPA ID# OH 981000557.
8. They do not generate wastes but transport hazardous, non-hazardous, liquid-solid
and special wastes. During the period in question, they used licensed
facilities primarily in Michigan.

Notice

Dana Corporation
P. O. Box 1000
Toledo, OH 43697

See Dana's response re the Dura Site which they attach herewith [but it is not attached]. The haulers thought of Tyler, Dura and Stickney collectively as one large

dump. All three sites were used on a regular but random basis by Dana. As Stickney closed much earlier than Tyler or Dura, less Dana waste was sent to Stickney. Any waste identified as having gone to Dura may actually have gone to Stickney or Tyler, as it was not uncommon for a hauler, upon his arrival at the Dura Site, to be stopped at the gate and directed to one of the other Sites. Dana objects to providing an Affidavit.

Follow-up 104

1. Mark G. Hess, Legal Counsel for Dana; Arthur Petz; and Robert Breymaier.
2. - 7. Refer to Dana's Dura Landfill responses dated 3/22/93 attached hereto [but it is not attached].
8. Objects to question as overbroad and not relevant.

Who said this
have Frank
follow-up on it.

relationship to
104-Doehler Die Casting.

Doehler-Jarvis Ltd. Partnership
5400 N. Detroit Avenue
Toledo, OH 43612

They were not organized until 1990. They have put the former owners of the plant on notice regarding this.

1. Marty McCullum, Plant Controller; Alvin Boerst, Purchasing Agent; David Adkins, Purchasing Manager.
2. No information. Also, they have no documents of the previous owners.
3. They know of no such persons. However, previous owners were: NL Industries and Farley, Inc.
4. OHD 005045992.
5. - 6. No knowledge, but the previous owners may know.
7. They never used the Sites.
8. They did not exist from 1951 to 1981. NL Industries may have this information.

NL Industries - successor 104(e)

Notice

Successor 104

mentioned merowski

Dura Corporation
1708 Northwood Drive
Troy, MI 48084

Dura Corp. and Dura Mechanical Components, Inc. are separate, unrelated legal entities. Dura Mechanical is a subsidiary of MC Holding Corp. who purchased certain assets of Wickes Mfg. Co. in 1990, assuming a lease obligation at a facility in Toledo. The owner of this facility was Wesnovtek Corporation of Birmingham, MI which is directly related to the former Dura Corp.

1. David Bovee, VP-Finance of Dura Mechanical; Michael Bauer, former attorney for Wickes; Ron West, principal of Wesnovtek, formerly Dura Corp.; Ron Scott, Mgr.-Mfg./Engineering, Dura Mechanical; Richard Sherman, Dir.-Purchasing, Dura Mech.
2. Variety of retained files after vacating Toledo premises.
3. Dura Corp. was a wholly-owned subsidiary of Kidde, Inc., a N.Y. corp. Wesnovtek provided 2 contacts: Terrance Faye of Pitts., PA and Paul Sullivan, Esq. (former attorney of Kidde, Inc.) of Montclair, NJ.
4. 1989 ID No. of Dura Corp. is OHD006556427.

Send
Transporter 104(c)

Envirosafe Services of OH, Inc.
1600 Madison
Toledo, OH 43624

1. Kenneth L. Humphrey, Dir. of Environmental Affairs; Deborah Golden, General Counsel for Envirosafe; James E. Hamilton, Pres.; James Truby, Operations Mgr.
4. OHD045243706. The former Fondessy/Envirosafe Transporter No. was OHD045247905.
7. No, Envirosafe never accepted any wastes for transport to the Sites from anyone.
8. From 1954 to 1983, Fondessy Enterprises, now known as Envirosafe operated a landfill at 876 Otter Creek Rd., Oregon, OH and deposited all its waste there.

ADDRESSEES RECEIVING SUCCESSOR-IN-INTEREST 104(E) LETTERS

Messrs. William A. Simon, Jr. and
William Prior
GenCorp, Inc.
175 Ghent Road
Fairlawn, OH 44333-3300

Mr. A. M. Galat
Treasurer
Dura Mechanical Components, Inc.
1708 Northwood
Troy, MI 48084-5521

Textileather Corporation
c/o Michael J. O'Callaghan, Esq.
Fuller & Henry
One Seagate, Suite 1700
P.O. Box 2088
Toledo, Ohio 43603

Messrs. Ron West and Marvin Novick
Wesnovtek Corporation
31000 Telegraph Road, Suite 250
Birmingham, MI 48010

Mr. David Hendrickson
Farley, Inc.
233 South Wacker Drive, Suite 500
Chicago, IL 60606

Mr. John B. Orgain, IV
Asst. Vice President and Secretary
Wickes Manufacturing Company
P.O. Box 562237
Charlotte, NC 28256-2237

Mr. Steve Holt
NL Industries
Wyckoff Mills Road
P.O. Box 1090
Hightstown, NY 08520

Walter Kidde and Co.

c/o Paul Sullivan, Esq.
Treanor, Harvey & Sullivan
34 Park Street
Montclair, NJ 07042

Mr. David Paley
Allied-Signal, Inc.
P.O. Box 2245-R
101 Columbia Road
Morristown, NJ 07960

Federal-Mogul Corporation
P.O. Box 1966
Detroit

Libbey Glass Inc.
c/o Douglas G. Haynam
Fuller & Henry
One SeaGate, Suite 1700
P.O. Box 2088
Toledo, OH 43603-2088

Materials
Friedel, Esq.

Nirav D. Parikh, Esq.
Owens-Illinois
Legal Department
One SeaGate, 30-LDP
Toledo, OH 43666

Browning-Ferris Industries of Ohio
and Michigan

c/o Robert L. Gulley
Senior Environmental Counsel
Browning-Ferris Industries
P.O. Box 3151
Houston, TX 77253

Managing Director
Capital, Inc.
4 Park Avenue
New York, NY 10022

Robert J. Jacobson
Manager-Environmental Control
Doehler-Jarvis Limited Partnership
5400 N. Detroit Avenue
M.P.O. Box 902
Toledo, OH 43697-0902

Dura
Papers
Hansen N.A.

~~Dura Mechanical Components~~

~~Dura Holdings~~
~~Wickes~~
~~Westminster = Dura Corp~~
Counsel

~~Successor-in-Interest~~
Successor-in-Interest

Farley Inc.

233 S. Wacker Dr., Suite 5000
Chicago, IL 60606

They have no relevant information; they did not exist in 1981. They believe the company you are seeking is Doehler-Jarvis of Toledo, Ohio, which entity was owned by NL Industries

of New York in 1981. They have been previously identified to you by the current owners of Doehler-Jarvis. In 1982, Farley Inc. (then known as Farley Metals, Inc.) purchased assets including the Doehler-Jarvis company's assets from NL Industries. Their purchase of the assets and operation of the business they called Doehler-Jarvis Division occurred after the date of EPA's inquiry.

Federal-Mogul Corporation

P. O. Box 1966
Detroit, Michigan 48235

Federal-Mogul did not own or operate any facilities in the Toledo area during 1951 to 1981. In 1985, they acquired the stock of The Mather Company (now Mather Seal

Company) which had only one Toledo plant by that time and which Federal-Mogul sold within a year of its purchase. They have no records about Mather.

1. Nancy S. Martin, Assoc. Gen. Counsel; Douglas Haynam, Esq. of Fuller & Henry.
2. See Attachment A to this letter and relevant documents previously submitted to EPA in regard to the Dura Site.
3. Ernest J. Zammit, Jerry A. Cooper, George A. Head, John S. Mermer and George Dimit, stockholders of The Mather Company in 1985. New Mather Metals, Inc., an unrelated entity that now owns the remaining "Mather" plant and City of Toledo.
4. A list of 22 EPA ID numbers is enclosed as Attachment B.
8. Federal-Mogul did not generate any waste in the Toledo area during 1951 to 1981 and has no records from which to determine where The Mather Company disposed of its waste nor knows of any one who does.

Flower Memorial Hospital

5200 Harroun Road
Sylvania, OH 43560

Flower Hospital (formerly known as Flower Memorial Hospital) is engaged in an ongoing, diligent record search and interviewing process. So far, there is no evidence they

used the Sites and they object to all the requests. They give a detailed definition of Hospital Waste and Hospital Supplies.

104e Successor
follow-up.

See Dura Tdfl response

104- Mather Seal
gen/successor

1. They list 14 names and addresses.
2. After diligent review, no relevant documents were found. In 1992, they destroyed 44-1/2 tons of old records some of which might have been relevant, see Exhibit A attached.
4. OHO-054163209
5. They answer with a lot of meaningless blah blah.
7. Flower believes it may have dealt with one or more commercial waste haulers, but can locate no records re same.
- 7e. More blah blah.
- 7g. Flower believes the haulers would have selected the site.
8. Flower can find no evidence of using the Sites. Flower believes some of its waste was incinerated and together with other waste was hauled away to unknown sites. Body parts were disposed of in cemeteries. Certain recyclable solutions and valuable materials may have been reclaimed by salvage companies.

GTE North Incorporated
29 West Main Street
Norwalk, OH 44857

They now have a new address in Marion, Ohio.

1. They list 6 names and addresses throughout GTE.
2. All business records still in existence were reviewed by Leo Smith, Jean Fowler, Chris Fields and Mike Fesenmyer.
4. They list 9 Ohio EPA ID numbers.
6. Unknown, except for Tom Uhler a retiree who can't remember.
7. Copy of contract dated 1976 between GTE North (then known as General Telephone Company) and Benton Village Sanitation Service is enclosed as Attachment 1. As Benton was purchased by Waste Management, Inc. in 1972, GTE contacted WMI and was told all WMI's waste was hauled to Evergreen Landfill in Northwood, Ohio.

Notice:

GenCorp Inc.
c/o J.P. Bonsky, Statutory Agent
175 Ghent Road
Fairlawn, OH 44313

and

GenCorp, Inc.
d/b/a GenCorp Polymer Products
1722 Indian Wood Circle
Toledo, OH 43537

GenCorp objects insofar as these requests seek protected information or information prior to the time they purchased the facilities in question and because the requests are unduly burdensome, call for meaningless speculation and are beyond the EPA's scope of authority. They also object to Instruction Nos. 3, 6, 7, 8, 11 and 14.

1. Ronald W. Frase, Mgr. Corp. Environmental Technology of GenCorp; Mike Sapovich, Environmental Coordinator, Textileather Corp.; Felix Teczynski, Oiler: Maintenance, GenCorp Polymer retiree; Frank Komisarik and John Poskar, production workers at Textileather Corp.; William A. Simon, Jr., Asst. Gen. Counsel, GenCorp, Inc.
2. Objects to the extent EPA seeks protected information.
3. Objects, this is too broad, vague and ambiguous and calls for speculation.
4. Toledo Plant's EPA ID No. was OHD 980 279 376.
5. Objects, but states the City of Toledo operated the Sites as public landfills and, under Ohio law, the City of Toledo is responsible for the proper closure of the Sites.
- 7 a. City of Toledo.
- 7 b. At various times from the late 1950's to about 1962.
- 7 c. Their waste included paper, vinyl, empty resin and limestone bags, empty 55 gallon drums and some open drums filled with oil-soaked rags. About 10 or 12 sealed, 55-gallon drums containing an unknown liquid were sent to the Site. They give detailed descriptions of their manufacturing processes regarding fabric dying and finishing, pyroxylin fabric coating, vinyl plastisol coating, calendered vinyl, printing and finishing, rubber saturating coating, urethane coating, army duck, and latex coating.
- 7 d. GenCorp was formerly known as The General Tire & Rubber Company.

- 7 e. Unknown, but about 8 truckloads of waste were taken to the Site on a daily basis during the period in question. The trucks were of a van type and a 2-1/2 ton flat bed stake truck.
- 7 q. John Poskar and Felix Teczynski - all others are now deceased. Poskar says two of the deceased drivers told him they used the Site prior to 1960.
- 8. Dura, Kings Road and Buckeye.

Let go for now.

General Motors Corp.
3044 General Motors Blvd.
Detroit, MI 48202

In summary, GM has no information indicating involvement with the Sites. They request a copy of any information in EPA files alleging their involvement at the Sites.

- 1. Joseph Goetz, Sr. Environmental Engr., GM Powertrain Div.; Al Hoag, retired Environmental Eng., Powertrain; Ed Hugill, retired Plant Engr., Powertrain; Bruce A. Wharram, retired Gen'l. Superintendent, Powertrain; Dennis A. Earl, Mgr., Plant Engineering, Powertrain; John D. Benson, retired Superintendent of Maintenance, Powertrain; Barry Cousins, Pres., Cousins Waste Control, Inc.
- 2. Documents provided herewith are in response to Request No. 8.
- 4. Powertrain Hydramatic Plant EPA ID No. OHD005041371.
- 7. GM did not use the Sites.
- 8. GM objects to this request as irrelevant and immaterial to the Sites. Plant trash for Powertrain Hydramatic from 1956 to 1981 was disposed of on-site at the Hydramatic facility, or at the Hagman Road or King Road Landfills. Oils and sludges were handled by various disposal services which are listed herein.

Off List.

— **Gulf Oil**
Cumberland Farms, Inc.
P. O. Box 1000
Canton, MA 02021

After a careful review of records, Cumberland could find no evidence linking it to the Sites. They were placed on EPA's mailing list in error. Chevron U.S.A., Inc. purchased Gulf Oil Corp. in 1984 and, in Cumberland's opinion, assumed all of Gulf's liabilities.

successor 104(e)

ITW
3600 West Lake Avenue
Glenview, IL 60025

new:

ITW
1724 Indian Wood Circle
Suite A
Maumee, OH 43537

division of theirs. About 3/8/88, Champion sold the assets of DeVilbiss to Eagle Industries, Inc. About 4/27/90, ITW purchased the assets of DeVilbiss Industrial/Commercial Business including the Technical Services building at the Phillips Avenue site, but did not purchase the main DeVilbiss building at the same site. Eagle retained DeVilbiss' health care division and its consumer air compressor division, which it moved to Tennessee in 1989. Two other former DeVilbiss buildings (the sheet metal and rubber plant buildings) were sold to other parties by Champion in early to mid-1980. ITW believes any existing records from 1951 to 1981 would be in the possession of Eagle Industries, Inc., Two N. Riverside Plaza, Suite 1100, Chicago, IL 60606; Cooper Industries, Inc., 1001 Fannin, Suite 4000, Houston, TX 77002 and Champion Spark Plug Co. ITW will continue its investigation.

Follow-up to
DeVilbiss

104(e) - Eagle

Let go for now -

Inland Chemical Division
Van Waters & Rogers, Inc.
30450 Tracy Road
Toledo, OH 43465

new:

Van Waters & Rogers, Inc.
Subsidiary of Univar
6100 Carillon Point
Kirkland, Washington 98033

VW&R has no records from the time of Inland Chemical's operations in Toledo through 1976 when VW&R acquired Inland. VW&R closed the Inland Toledo facility in 1977. Inland was and VW&R is a distributor of virgin chemical products, but is not a manufacturer and thus does not generate hazardous waste. Since 1977, VW&R did generate a small amount of hazardous waste as a result of handling and repackaging certain products. This was properly disposed of through VW&R's Chemcare Div. at an approved disposal site. As far as they can determine, neither VW&R nor Inland used the Stickney/Tyler Sites. Because of VW&R's frequent receipt of EPA 104(e) letters re sites where VW&R's product labels appear, they would like to clarify that they are not responsible for the disposal of such products by their customers under Section 107(a)(3) of CERCLA absent a tolling or formulation agreement with the customer.

1. Jack M. Hohman, Toledo Branch Operations Mgr.; Jack W. Mumford, Toledo Branch Warehouseman; Geo. A. Smith, Toledo Branch Driver; John Weinrich, Nat'l. Accts. Mgr., James W. Holley, Legal Admin.
2. After a thorough search, no documents were found and none are believed to exist.
4. OHD800985799 (Walbridge).
7. The present Operations Mgr., Mr. Hohman is not aware of such activity. Former managers of Inland were Dick Zalinsky, Earl Howser (deceased), Kenny Parker, Bob Superzinski and Jerry Fokes.
8. Inland's hazardous wastes were disposed of by Inland's Chemical Reclamation Division which VW&R did not purchase from Inland. Based on VW&R's investigation, Inland did not send hazardous wastes to the Sites; however, they did send some once to Dura Landfill.

Let go for now -

J. C. Penney Company, Inc.
P. O. Box 65900
Dallas, TX 75265

Gives general objections and reserves right to file a supplemental response if additional information turns up. They have retained no records for 1951 - 1983.

1. They list 20 of their store managers with 20 store addresses in Ohio, in addition to Penney's Ohio District Managers, Jack Chenowith and Mike Pinkos.
2. No documents other than the survey questionnaire that was prepared and sent to the 20 Ohio store managers after receiving EPA's 104(e) letter were used.
3. Lists 32 former Penney employees at its Ohio TBAs (automotive service centers).
6. None, except those listed in 1 and 3, above.
8. Penney's wastes during 1951 to 1981 were disposed of by Tom Davis, Hwy. 102 & Greenfield Rd., Southfield, MI; and Sure Way Disposal, Inc., 750 Baird Rd., Parma, OH.

Write nasty to
Chrysler for
missing volume.

Jeep Eagle Corporation
1000 Jeep Parkway
Toledo, OH 43456

Schiff Hardin & Waite, Chrysler Corporation's attorneys responds for Jeep, a former subsidiary of Chrysler Motors Corp. which merged into Chrysler Corp. in 1989. Chrysler's

predecessor, American Motors Corporation has submitted information to EPA twice before in response to 104(e) requests re Stickney, first in June of 1993 and again in August of 1984 when it provided a 5-volume set of information. EPA's third and latest request does not seek anything new that has not previously been submitted by Chrysler and AMC; and Chrysler has nothing to add. Therefore, Chrysler will not submit a formal response but has enclosed Affidavits regarding both Stickney and Tyler and all documents in their possession relating to Tyler (which may have already been provided to EPA). During 1951 to 1981 when Kaiser-Jeep Plant Nos. 1 and 2 were operated by Chrysler, AMC and Jeep Eagle Corporation, no hazardous waste was sent to Tyler.

Skip for now

Jeffers Crane Services, Inc.
5421 Navarre Avenue
Oregon, OH 43616

Jeffers' lawyer, Wolfgang Drescher of Bischoff, Kenney & Drescher answers that, on 8/30/72, Fondessy Enterprises, Inc. purchased certain assets of Paul R. Jeffers, Inc. (now

known as Jeffers Crane Services, Inc.). Jeffers has never disposed of hazardous substances at the Sites.

1. Richard E. Fondessy, Robert L. Fondessy and Roland E. Fondessy.
2. Articles of Incorporation for Jeffers, Asset Purchase Agreement dated 8/30/72 and Code of Regulations for Jeffers, all enclosed herewith.
8. Prior to 1972, Jeffers did not exist. From 1972 to 1981, Jeffers did not use the Sites. All Jeffers' waste was hauled by Fondessy Enterprises, Inc. to its 876 Otter Creek Road site in Oregon, Ohio.

Leaseway Transportation Corp.
3700 Park East Drive
Cleveland, OH 44122

After diligent search, Leaseway could find nothing linking it to the Sites. They will assume EPA concurs with this unless they are advised in writing to the contrary.

1. Lynn A. Clark, Dir. of Environmental Affairs.

2. To the knowledge of the undersigned (Douglas K. Cooper, V.P. Operations Law) no such relevant documents exist.
7. Unknown. Leaseway is a holding company incorporated 11/9/60 with its principal place of business in Cleveland. Leaseway has never owned or operated any facility in Toledo or surrounding areas.
8. Leaseway's waste consists of general office trash which has been disposed of through various contractors in the Cleveland, Ohio area. Leaseway is unaware of any of its wastes being disposed of at Sticknwy/Tyler.

morowski said all
the glass co. used
the site.

Libby Glass, Inc.
P. O. Box 919
Toledo, OH 43697-0919

Libby gives nine detailed objections to the requests and instructions.

1. Ed Mauntler, Earl Reid, Anthony Sloma and Wendy Daudelin - current Libby employees, and Robert Towles of Owens-Illinois, which controlled Libby prior to 6/24/93, plus various other Owens-Illinois employees.
2. They enclose portion of 103(c) response dated 4/28/81 which sets forth the sites to which wastes from Libby's Toledo plant were taken. This document does not name either Stickney or Tyler. Libby also reviewed documents at the EPA office in Bowling Green, Ohio and the TMACOG Environmental Resources Inventory of . . . Sites. Nothing pertinent was located at Owens-Illinois.

4. OHD005034459.

6. - 8. See Libby's 103(c) response of 4/28/81, attached.

skip
mentioned by Sherwin

Notice
Matlack Company
1728 Drouillard Rd.
Toledo, OH 43612

Matlack, Inc., Wilmington, DE asks EPA to give it any information linking it to the Sites, their own search has yielded none.

1. John McKee, Mgr. of Environmental Affairs; Dan Doyle an employee who worked during 1951 - 1981 at Matlack's Toledo terminal.
4. OHD 077 569 960.

8. Matlack's Toledo Terminal has been in operation since 1964. Matlack has no records of and cannot identify where wastes emanating from the Terminal were disposed of. However, Matlack recently entered into a Consent Decree with respect to the Commerical Oil Services Site and, judging from records provided by EPA, it appears that all of the Terminal's wastes were disposed of there.

Follow-up to Morowski

Mercy Hospital
2200 Jefferson Avenue
Toledo, OH 43624-1181

They have no recollection of ever using either Site. No records exist.

1. Sister Phyllis Ann Gerald, Pres., CEO and Admin. of Mercy from 1960's until 1991 and Richard Napierala, Dir. of Maintenance & Engineering since 1973.
3. OHD063713366.
8. During 1951 to 1981, Mercy's waste was either incinerated on site, flushed into the city sewers, or placed in on-site containers for removal and disposal by independent contractors.

Copy response for Shami

Mulberry Phosphates, Inc.
P. O. Box 797
Highway 60 East
Mulberry, FL 33860

Mulberry (formerly Royster Company) recently emerged from bankruptcy and therefore any claims against them concerning the Sites were discharged. They enclose copies of relevant bankruptcy and reorganization documents.

During reorganization, Mulberry sold its assets comprising its Farm Marketing Group, including the name "Royster" to a newly formed and unrelated company, Royster-Clark, Inc. Farm Marketing Group's inactive facility at 4401 Creekside Blvd., Toledo was sold to Mark S. and Linn A. Gorney. If they don't hear from EPA by 11/1/93, they will consider the matter completed and close their files.

1. Ivan Nance, Environmental Mgr., Don Talmon, Dan Konold; and Chris Burgess of Royster-Clark. Mr. Konold is a former employee who worked with the Farm Marketing Group. He indicated that, because the Toledo facility had ceased operations by the time he joined the Group, he has no substantive knowledge regarding records. After the sale of the Group to Royster-Clark, Inc., 909 Main Street, P. O. Box 250, Tarboro, N.C. 27886, the records of inactive locations such as Toledo were destroyed. Enclosed as Exhibit "A" and "B" are Mulberry's reorganization plan and the court order confirming same.

4. OHD005046966.

8. Mulberry is unaware of where waste from 4401 Creekside Blvd. was taken and how it was disposed of.

Ohio Dept. of Transportation
1600 S. Detroit Ave.
Toledo, OH 43616

In summary, no State forces had used either of the dumps.

1. John Earl, Lucas Cty. Garage Superintendent, Operations Dept.; Chuck Claytor, Northwood Outpost Garage, Superintendent, Operations Dept.; Bob Breese, P.E., Supervising Engr. of Construction Projects at "Manhattan leg" of IR-75.

2. - 3. None available, as processing slips are destroyed after 3 years and project records are destroyed after 7 years.

4. Lucas Cty. ODD 982-066649; Walbridge OHD 982-066763.

7. No one from State of Ohio.

8. Lucas Cty. Garage's refuse was sent to Evergreen or King Road landfills. Walbridge's litter was sent to Cummings/Hanley, Evergreen or King Road dumps.

NOTICE

~~Ship for now~~
mentioned by
Marowski

Owens-illinois
One Sea Gate, 30-LDP
Toledo, OH 43666

Owens gives 8 detailed objections to the requests and definitions. To date, Owens has no information linking it to the Sites.

1. Robert Towles, Inga Hoeflinger, Frank Butler, Thad Franklin, George Managhan, William Gilders, Larry Townsend and W. Blessing.

2. Documents obtained from OEPA and some of its own records.

5. - 6. Documents obtained from OEPA indicate that the City of Toledo along with other property owners operated and controlled the activities on the Sites.

8. Owens submits 103(c) filings showing that J. A. Nycz hauled refractory brick possibly contaminated with lead residue from Owens to King Road, Dura and B.F.I.

Notice
mentioned by Morawski

Plabell Rubber Products Corporation
P. O. Box 1008
300 S. St. Clair Street
Toledo, OH 43697

Plabell is a new corporation formed in 1992 to acquire the rubber plant at 300 South St. Clair. It began operations on 4/13/93 by purchasing Plabell Rubber Products, Inc. which was in Chapter 11 and the right to use the "Plabell" name. Plabell feels it has no

responsibility for the waste disposal practices of the former company and has limited access to its records.

1. Lawrence K. Friedman, Pres.; Delbert Base, who also worked for the former owner in the late 1970s; Barb Calcamuggio.
2. Records left on the premises by the former owner consisting of purchase journals, invoices, and check register from 1980 and 1981 showing payments to waste haulers (see 7, below).
3. The previous owner; Community Sanitation, Waste Management, Inc. and Browning-Ferris, Inc.; and employees of the former owner.
4. OHD005034806.
6. - 7. Community Sanitation, Waste Management, Inc. and Browning-Ferris, Inc.
8. They never used the Sites and have no knowledge that the previous owner did.

Plaskon Electronic Materials
Independence Mall West
Philadelphia, PA 19105

104 - Successor & Gen.
co - Plaskon Holding Inc
Allied Chemical
Libby Owens Ford Glass
Plaskon
Rohm & Haas

facility at 2829 Glendale Ave. (now closed). The Toledo facility had been owned by Allied Chemical Corp. from 1953 to 1979. Allied purchased it from Libby-Owens-Ford Glass Company, who owned it since 1943. Rohm and Haas has no information as to Plaskon's use of the Sites. They enclose their response to EPA's Dura Landfill Site 104(e) Request as it includes Allied's Eckhardt survey responses and other waste information concerning the Plaskon Toledo facility.

Plaskon is now a wholly-owned subsidiary of Rohm and Hass Company. Rohm did not own Plaskon during 1951 - 1981 but acquired Plaskon in 1984 together with the Toledo

notice

Reichert Stamping Co.
P. O. Box 351510
Toledo, OH 43635-1510

1. Paul B. Reichert, Robert F. Reichert and Betty Michelson.
2. All documents in their possession regarding this matter are provided herewith.
4. Ohio EPA No. 2IS0008*ED.
7. Harold Osborn and Richard Klein, both deceased.
- 7 d. Reichert Stamping Company.
- 7 e. Approximately one to four hoppers of waste per month.
- 7 g. Community Sanitation Services, Inc.
- 7 h. See enclosed photocopies of old invoices.
- 7 i. Reichert had no knowledge of where Community disposed of waste.
- 7 m. Reichert contracted with Community Sanitation Services, Inc. and Revere Cooper & Brass for copper and brass scrap; with Tuschman Steel and its successors for steel scrap; and with Standard Oil Company for disposal of oil drums.
- 7 o-p. The only records available are attached herewith.
- 7 q. See response 1, above.

skip for now

Riverside Hospital
1600 N. Superior Street
Toledo, OH 43604

Riverside's responses are preliminary and it reserves the right to supplement them later. Riverside contracted with several services from 1951 to 1981 (Community Sanitation Service, Inc. and A.B.C. Sanitation Service) but doesn't know where they dumped the waste.

1. Patricia W. Shaw, Staff Attorney; Carroll L. Ashley, Pres. & CEO; plus 16 other hospital employees.

2. Refuse Cancelled Checks 1967 - 1974 (attached as Exhibit A).
3. None at the present time, but their investigation is ongoing.
4. No. 0448010082N002, obtained 6/30/89.
8. Unable to confirm where waste was taken to. From 1951 to the present, Riverside has consistently incinerated most of its waste.

skip for most.

Rudolph-Libbe, Inc.
6494 Latcha Road
Walbridge, OH 43465

They took no waste of any kind to either Site. See their letter of 3/3/93.

1. Marilyn Rudolph, Asst. Secretary/Treasurer; Gary Haas, Chief Project Mgr.; Charles F. Hutchings, V.P. - Risk Mgr.
2. No longer have in their possession documents for the period in question.
8. Their clean construction waste consisting of broken concrete, brick and block, and scrap lumber may have been taken to the Dura Landfill.

See Dura Response

St. Vincent Medical Center
2213 Cherry Street
Toledo, OH 43608-2691

An ongoing, diligent record search and interviewing process are being conducted by H. Terrence Smith, General Counsel for St. Vincent. They object to all of the requests inasmuch as EPA seeks information which could not reasonably be obtained or assembled in the time period allotted them, or which falls under the attorney/client privilege, etc.

1. Kathleen W. Kolodgy, former Legal Counsel; William A. Sutton, V.P., Support Services; Donald Helvey, Admin. Dir.; Mike Coyle, Dir., Housekeeping; Sr. Janet Gallup, Archives Dir.; Mina Patriarca, Asst. V.P., Quality Mgmt/Risk Mgr.; Samatha Platzke, Mgr. of Fiscal Services; and Jan Weimer, Asst. Gen. Mgr.
2. St. Vincent's responses regarding Dura which EPA already has and confidential attorney/work product documents prepared in connection with its investigation concerning Dura.

4. Generator of Infectious Waste EPA Registration No. 48-G00075; Transporter of Infectious Waste EPA Registration No. 48-T-00152 (both issued 6/18/93 and expiring 6/17/96).
5. St. Vincent understands this request as being directed to the Site. They are unable to identify any such persons.
6. - 7. St. Vincent has no reason to believe its waste was taken to the Sites.
8. From 1951 to 1981, much of St. Vincent's waste was incinerated on-site. X-ray films were subject to silver recycling. Human body parts and similar pathological materials were buried in area cemetery facilities consistent with applicable procedures required of Catholic health care institutions at the time. Waste disposal arrangements for incinerator ash and other non-combustible solid waste may have been made with Benton, Cousins, and/or Waste Management. They believe WMI used the Evergreen landfill.

Skip for now

Sears Roebuck & Company
Sears Tower
Chicago, IL 60684

Dennis L. Hudson, Sr. Counsel for Sears,
Dept. 766, 3333 Beverly Road A2-266A,
Hoffman Estates, IL 60179 answers that their
search for information is limited to three
Toledo facilities which operated from the 1960's to the present.

1. Douglas Ashmun, Store Gen. Mgr. and Thomas Stacy, Auto Mechanic at the 3408 W. Central Ave. store; Karen LaPoint, Store Gen. Mgr. and Dick Maxfield, former Facilities Mgr. of the 3725 Williston Rd. store; Deborah Lewandowski, Facility Mgr. and Robert Hartwig, Technical Supervisor at the 60 Fearing Blvd. store.
8. No information. Sears employees recalled some of the transporters that may have been used but not the final destination of the waste.

Skip for now

**Sinclair Manufacturing
Associates, Inc.**
2650 N. Reynolds Road
Toledo, OH 43615

Although incorporated as a manufacturing company, Sinclair has never done so but is strictly a brokerage of food and household products. The only waste they generate is ordinary office work papers.

Frank:
What is the connection
between these companies?

see Dura Response
mentioned by
Czyzanski

Sun Refining & Marketing
P. O. Box 920
1819 Woodville Road
Oregon, OH 43616

new: **Sun Company, Inc.**
Ten Penn Center
1801 Market Street
Philadelphia, PA 19103-1699

1. Thomas J. Haines, in-house counsel; Joyce C. Wilson, paralegal; and former employees they consulted.
2. It is highly unlikely Sun Toledo Refinery ever used the Sites.
4. OHD005046511.
8. Objects to this request as overly broad and unduly burdensome as it is not limited to Stickney/Tyler.

Skip for now

Surface Combustion, Inc.
P. O. Box 428
Maumee, OH 43537-0428

Surface did not exist prior to Dec. 1987
and has never used the Sites.

1. David G. Orzechowski.
3. Surface acquired certain assets from FL Aerospace Corporation in 1987. FL was formerly known as Midland Ross Corporation which operated the Surface Combustion Div. in Toledo. Documents re any involvement of Midland Ross with the Sites remain in the possession of FL Aerospace, now known as Grimes Aerospace Company.
4. OHD097232946.

Skip for now

and

Teledyne CAE
P. O. Box 6971
1330 West Laskey Road
Toledo, OH 43612

Teledyne
1901 Avenue of the Stars
Los Angeles, CA 90067

Since Teledyne retains records for only 7 to 10 years and the period 1951 - 1981 ended 12 years ago, it is extremely difficult if not impossible for them to respond. Also many former knowledgeable employees are now deceased. Teledyne's production of small gas turbine engines began at Toledo in 1955; therefore, its response does not include the years 1951 to 1955. They object to Instruction Nos. 4, 6, 7 & 9 and Definitions 1 & 11.

1. Objects. Frank Wood, Comptroller; Thomas E. Elliott, Sr. Admin. - Safety, Fire & Environ. Compliance; Donald M. Becker, Dir. of Operations.
2. Objects. It conducted an initial review and search for documents but found none and believes none exist.
3. Objects. After diligent interviews of present and former employees, they could not identify any such persons.
4. OHD005046677.
5. - 7. Objects. No knowledge of any Teledyne involvement with the Sites.
8. Objects. Prior to 1955, Teledyne was not located in Toledo. Their general policy was to send scrap metal and liquid materials to recycling and reclamation companies.

*Follow-up =
Morowski et al.*

*What is Status of
Textileather Div.
of GenCorp.*

Textileather
3729 Twining Street
Toledo, OH 43608

Michael J. O'Callaghan of Fuller & Henry answers for Textileather which did not exist until 1990, when it was incorporated for the purpose of purchasing the assets of GenCorp, Inc. Gen Corp had operated a manufacturing facility on Twining Street up until May 1990, when its employees formed Textileather through an employee stock ownership plan. He requests that Textileather be relieved of its obligation to respond to the requests since GenCorp has already conducted diligent interviews of former employees now working for Textileather for its response.

SKIP.

— **The Kroger Co.**
1014 Vine Street
Cincinnati, OH 45202

Any contacts with Kroger are to be made through Thomas P. O'Brien, Jr. of their Law Department.

1. Ten Kroger employees are listed from various locations; plus Bob Benton, Bob Bechstein of B.F.I. and Bob Freeman of Evergreen Landfill.
2. Following a thorough search of records available in Toledo, Columbus and Livonia, they attach as Exhibit A 1-14 copies of store sanitation service agreements with Benton Village Sanitation Service; as Exhibit B 1-5 copies of memos relating to refuse collection; as Exhibit C 1-4 sample store trash hauling agreements in use during the 1980's.

3. Bob Benton of Benton Village Sanitation Service, Bob Bechstein of Browning-Ferris Industries, Waste Management of Toledo, and Jim Wygle, V.P. Operations of Kroger.
6. No Kroger employees have any actual knowledge. Bob Freeman of Evergreen Landfill may have some.
7. No knowledge of any person hauling anything, including store trash, to either Site. During 1951 - 1981, Kroger did not operate a manufacturing facility in Lucas County.
- 7 a. Bob Benton remembers that S. E. Freeman & Son hauled store trash until 1966 or '67. Freeman was sold to Community Sanitation which was later sold to a Mrs. Brown who in turn sold to Browning-Ferris Industries. Benton believes both sites were owned by the City of Toledo.
- 7 c. Kroger supermarkets used dumpsters or bins of varying size which were emptied periodically of waxed cardboard, cardboard, paper, wood crates, outdated food products, plastic bags and wrap, floor sweepings and trash, metal and plastic display materials, etc. Kroger does not believe any hazardous waste was placed in its refuse containers.
- 7 d. Unless third parties placed items in store dumpsters, anything contained therein was owned by Kroger.
- 7 h. Payment would probably have been by check, but records no longer exist.
- 7 n. Most stores probably had an 8, 12 or 16 cubic foot dumpster owned by the hauler. Smaller stores may have had bins in the back room.
8. According to Bob Benton and Bob Freeman, store trash may have gone to the King Road, S. E. Freeman, Evergreen and B.F.I. landfills.

SKIP FOR NOW.

The Ohio Bell Telephone Co.
45 Erieview Plaza, Rm. 1600
Cleveland, OH 44114

A diligent search has produced no information that Ohio Bell sent hazardous waste to the Sites.

1. James D. Jagers, Mgr. - Environment/Fire Safety; John P. Gaffney, Mgr. - Environmental Compliance.

Freedom of Information
to Read Parent Company

2. After diligent search, no responsive documents were found.
4. OHD980902456.
8. Reclaimable material was shipped to an out-of-state AT&T salvage facility for sale. Lead-acid batteries were sold to local scrap dealers or battery recyclers. Used motor oil was sold to local reclaimers. The remaining waste (mostly paper) was taken by local haulers to nearby landfills; but a diligent search has failed to locate any written contracts for 1951 - 1981.

The Sherwin-Williams Company
1255 Osage Avenue
Maumee, OH 43537

Donald J. McConnell, Environmental Attorney
for S-W answers from 101 Prospect Ave., N.W.,
Cleveland, OH 44115-1075. They request all
EPA information used to make these allega-
tions pursuant to Freedom of Information Act.

1. Paul Junkins, Mgr.- Maumee; Greg Stepanian, Sales Admin.; Nathan Eppink, Customer Service Mgr.; Gary Engle, Dist. Mgr.; Clyde Jenkins, Mgr. - Toledo.
4. OHD986976645.
8. The Maumee store did not begin operation until 1986.

The Toledo Blade Company
541 North Superior Street
Toledo, OH 43604

Joseph A. Gregg of Eastman & Smith responds
that Toledo Blade has no information linking
it to the Sites. He awaits a response to his
FOIA request of 9/3/93 for any information

EPA may have alleging Blade's involvement with the Sites. Blade is a newspaper publisher. In compliance with RCRA regulations beginning in 1980, their waste inks and solvents were transported off-site to a RCRA facility. Blade objects to Instruction Nos. 4, 6 and 7 as not being required under CERCLA.

1. Sylvia Robinson, current employee; Robert Stebli, retired Plant Engineer; Harold Wolfe, retired Bus. Office Mgr. Any current or former Blade employee may be contacted through Joseph A. Gregg, Blade's attorney at (419) 241-6000.
2. Blade's files in the control of Sylvia Robinson were reviewed; none show that Blade used the Sites. Copies of any documents will be provided upon request.

104(e) ~~Sherrin~~

To Cleveland office
This has not been limited to
the Maumee Store.

NOTICE

Referred to several
times in interviews

3. No current or former Blade employee is known to have knowledge of where its wastes were disposed of. Community Sanitation Services and Benton's Village Sanitation Services drivers who hauled Blade's waste may be able to provide additional information.
4. OHD005038021.
8. Objects as being improper and beyond the scope of CERCLA. Prior to 1973, Blade's wastes were hauled by Community Sanitation Services and thereafter by Benton's Village Sanitation Services n/k/a Waste Manatement, Inc. Blade is not certain where its wastes were disposed of but believes it was at Dura Landfill.

Notice

The Toledo Edison Company
300 Madison Avenue
Toledo, OH 43652
new: **Centerior Energy**
6200 Oak Tree Blvd.
Independence, OH 44131

All further contacts are to be made through William J. Kerner, Principal Counsel, Centerior Energy, P. O. Box 94661, Cleveland, Ohio 44101. They made 8 detailed objections to certain EPA Instructions and Definitions.

1. Wilbur L. Headen, Corp. Security Agent of Centerior conducted an investigation and consulted with 24 persons who are listed with their addresses.
2. Objects. Kenneth A. Peffer memo dated 8/27/93 marked as Attachment I; Toledo Edison's Records Retention Schedule dated 3/1/84 marked as Attachment II.
4. Ten facilities are listed with their ID numbers, none of which are known to have used the Sites.
6. Richard Mohler who was employed by Toledo Edison for 38 years as Foreman of the Underground Dept. at the Delaware Service Center remembers hauling construction material to Stickney, Tyler and Dura on a daily basis but never hauled or knew of anyone who did haul hazardous waste to the Sites. Mahler was not sure who made the disposal arrangements.
8. Objects. Of 14 persons interviewed, none can recall Toledo Edison using the Stickney/Tyler sites. Many do recall Dura, Evergreen, a site near Acme Station (Consaul and Wheeling Dump), one on the East side of Toledo, and the Central Avenue site. Used oil was given away to some Michigan company and A. Edelstein

Notice

& Sons bought transformers and capacitors from Toledo Edison and recycled them. Toledo Edison contracted with B.F.I. and Waste Management to haul their trash, each of which has its own dump site. Nothing hazardous was disposed of at any of these sites.

The University of Toledo
1014 Driscoll Center
2801 West Bancroft Street
Toledo, OH 43606-3390

Barbara E. Machin, General Counsel for the University answers based on a search of records and extensive interviews of past and present employees emanating from similar requests for the Dura Site, which information has been further supplemented to be responsive to Stickney/Tyler. They request we send them any EPA records suggesting the University may be a PRP under CERCLA. They object to Request Nos. 5, 6 and 7 as being vague, compound and ambiguous as applied to a non-manufacturing entity like a state university.

1. Leigh A. Casey, Hazardous Materials Coordinator; Stanley F. Morawski and Nelson J. Osenbaugh, haulers for Community Sanitation; Willard W. Smith, retired Professor & V.P. Business Affairs. In addition, its Response to the Dura Landfill Requests (which lists 36 persons) is attached as Appendix A.
2. None located. Any purchase orders or contracts from this time period were disposed of in the ordinary course of business. The minutes of Board meetings reflect approval of waste haulage contracts in 1962, '64, '65 and '70 for one year each with Community Sanitation Service, Inc.; a three year contract with B.F.I. in 1977, and another three year contract with Waste Management in 1980 (see Appendix B).
4. OHD051623734 (Main Campus), OHD982627515 (Scott Park Campus) and OHD068101989 (School of Art).
6. According to Stanley Morawski, University waste was hauled primarily to Hageman Road (see Appendix C). Nelson Osenbaugh who hauled for C.S.S.I. from 1961 to 1968 states that the Tyler dump was closed before he began hauling.
7. They deny disposing of or arranging for disposal of hazardous substances at the Sites. Their waste consisted of paper, cardboard and garbage.
- 7 a. Repeats their response to 2, above.

- 7 b. See Exhibits 1 - 6 to the Affidavit of Joyce M. Gregory, Secretary to the Board of Trustees attached as Appendix B.
- 7 c. Solid waste consisted of paper, cardboard and garbage, see Morawski Affidavit, attached as Appendix C.
- 7 g. The haulers used by the University would have decided which landfill to use. Stanley Morawski states that the University's wastes were hauled to the Hageman Road Landfill after it was opened in 1966 by C.S.S.I.
- 7 h. It is presumed the University paid for services rendered pursuant to approved contracts by checks issued on its general account.
- 7 m. No records, as there was no requirement upon the University during the relevant time period for such monitoring or record keeping.
- 7 n. The University maintained containers outside most buildings on campus which were emptied by the haulers. It has no recollection of the type of containers provided by C.S.S.I., B.F.I. or WMI.
- 7 o. See Exhibits 1 - 6 to Affidavit of Joyce M. Gregory, attached as Appendix B.
- 7 p. Minutes evidencing approval of contracts with C.S.S.I.
- 8. Solid wastes were incinerated on campus or disposed of in campus landfills. Laboratory chemicals were stored for potential future use, but were disposed of in compliance with RCRA regulations in 1985. Dura Landfill was used until 1966 by C.S.S.I. for solid wastes hauled from the University. After that, Hageman Road was used.

Send Successor 104

2025 Corporation

U.S. Corp. Co. (Agent)
32 Lookerman Sq., Suite L-1000
Dover, Delaware 19901

2025, formerly known as U. S. Reduction Co., previously owned facilities at 3838 Cecelia Ave., Toledo, OH 43608. 2025 objects to each and every request as arbitrary, capricious, vexatious, or seeking proprietary or confidential information. EPA's request for information dating back more than 40 years would require them to review millions of pages stored in locations throughout the world. The business now called 2025 has gone through several transformations in the last 30 years, including stock acquisitions and asset

transfers to new corporations and, as a result, many records have been lost, destroyed or are in the possession of entities over which 2025 has no control. They also make 7 detailed Disclaimers and Denials of ever having done anything wrong, or that they had anything to do with the Sites.

1. Thomas R. Hendon, former Dir. of Environmental Affairs.
2. Objects. They will provide EPA access to documents in their possession not lawfully protected upon three days' notice at the office of 2025's attorneys, Much Shelist Freed Deneberg & Ament, Suite 2100, 200 North LaSalle Street, Chicago, IL 60601. Contact Mary Lou Gassinger at (312) 3436-3100.
4. OH005039359.
5. Objects twice (abusive). No knowledge.
6. Other persons who may have known are past and present employees of unaffiliated third parties over whom 2025 has no control and therefore 2025 reserves the right to challenge their creditability.
8. All materials including any by-products generated by the 2025 Toledo Plant are sold to customers for reuse in their manufacturing processes or who reclaim precious metals from those materials. Between 1950 and 1965, by-products were stored at the Toledo Plant until customers were found to buy them. Beginning in 1965, materials were shipped off-site for storage at Municipal Services, Inc., 2020 Manhattan Blvd., Toledo, in anticipation of sale to others. Some material was sold for use in Toledo's concrete industry. Some was sold to secondary smelting operations in Newark and Rock Creek, Ohio. On rare occasions when no buyer was found, by-product materials were dumped in Monroe County, Michigan.

Send Successor 104

U. S. Reduction Co.
3838 Cecelia Avenue
Toledo, OH 43608

See 2025 Corporation as it was formerly known as U. S. Reduction Co. U. S. Reduction Co. (formerly known as U. S. Reduction Acquisition Corp.) was incorporated in 1984 - years after the events in question occurred. The same law firm answered for both companies and, although two separate sets of responses were made, the answers of both companies are substantially identical.

United Technologies Automotive Inc This response is submitted on behalf of both
5200 Auto Club Drive
Dearborn, MI 48126
new: 1641 Porter Street
Detroit, MI 48216-1984
United Technologies Automotive, Inc. and
United Technologies Automotive Systems, Inc.
which are wholly-owned subsidiaries of United
Technologies Corporation. From 1951 to 1981,
United has bought and sold several companies
complicating their search of records. They
object to Instruction 4 placing them under a continuing obligation to supplement
their responses as not being required by CERCLA; however, they will comply.

1. Objects. M. Suzanne Anderson, Staff Attorney and Pat F. Perrelli, Dir. of Health, Safety and Environ. Affairs contacted other unnamed United employees.
2. Manifests, waste disposal logs and purchasing records were reviewed none of which revealed use of the Sites by United; therefore, none have been submitted.
3. - 8. Objects to some questions. Not applicable, as United has no information linking it to use of the Sites.

Notice **Vallet Paint Service Company** Richard B. Hartley, Pres. of Vallet requests
1808 Adams Street
Toledo, OH 43624
mentioned by Sherwin EPA send it any records in their possession
suggesting Vallet may be a PRP under CERCLA.
They object to a continuing basis to the
entire Request including Instructions and cover letter as exceeding EPA's
authority under 42 USC Sec. 9604(e).

1. Michael S. Katz and Shane A. Faralino, of the Spengler Nathanson firm, attorneys for Vallet; and Richard B. Hartley, President. Please keep this information confidential. Also, they do not consent to unauthorized contact of their former employees without reasonable prior notice to Vallet. They attach their response re Dura which lists 15 additional employees.
4. OHD 018 385 419.
8. Vallet's wastes were initially taken only to Dura by Vallet employees using a company pickup truck. In the mid to late 1960's, Vallet contracted with Oscar Bell Trucking to dispose of its solid wastes and has no knowledge that Bell used the Sites. Oscar Bell died several years ago.

Mittak was a customer of Vallet.

Walbro Corporation
6242 Garfield
Cass City, MI 48726

Walbro Automotive
7325 Douglas Rd.
Lambertville, MI 48144

Walbro Automotive is the former Sharon Mfg. Company. Sharon was purchased by Walbro Corporation from Cooper Industries in 1990, therefore difficult for Walbro to reconstruct much of the information requested for the period from 1951 to 1981.

- 104 - Cooper
3
Sharon
1. Cary T. Grover, (Walbro) Corp. Environmental Mgr.; Stephen Rutz, former (Sharon) Plant Engr.; Nancy Schiffer, former Materials Mgr.; Bill Steffan, former Gen. Mgr.; Jerry Van Hove, former Production Leader.
 2. Trash Disposal chronology for Sharon is attached as Exhibit B.
 4. MID985606953. Prior to 3/22/91, MIG000007345.
 8. Prior to 1962, waste was burned on-site at Lambertville, MI. From 1962 to 1979, waste was hauled by Community Sanitation. From 1979 to 1981, Magnimet performed scrap metal recycling. From 1981 - 1984, BFI was used. In 1985, Community Disposal was used. In 1986, Waste Management purchased Community Disposal. From 1987 to the present, BFI has been used.

104 - nasty follow-up.
? relationship = R&K
SUCCESSOR 104
Bentonville
new:

Waste Management of Ohio, Inc.
6525 Wales Road
Norwood, OH 443619

Robert E. Leininger, Environmental Counsel of WMI responds for Waste Management of Ohio, Inc. (WMO), the correct name for "Waste Management of Toledo." They reserve the right to supplement or modify this response.

104 - R & K

Waste Management, Inc. - Midwest
17250 Newburgh Road, Suite #100
Livonia, MI 48152-2618

1. Debbie Alsip, WMX; Meg Briarton, WMI; Kevin Burke, WMO; Barry Cousins, Cousins Waste Control; Brian Goonan, WMX; Sue Griffin, WMO; Marcia Tilley, WMX; Kenneth Timming; and Jan Wiemer, WMO.
2. WMO and Ohio Waste Systems, Inc. acquisition and transactional documents.
3. - 6. Robert Benton and Kenneth Timming.

- 7. According to Kenneth Timming, former owner of R&K Refuse Removal, Inc., R&K transported and disposed of waste at the Sites.
- 7 b. Exact dates unknown. About 1964 for 1 - 1 1/2 years to Stickney, 1 - 3 times per week. When Stickney closed, to Tyler about 1 year, 1 - 2 times per week.
- 7 c. Stickney: commercial/residential solid waste, glass beads, empty paint and ink cans, floor sweepings. Tyler: commercial/residential solid waste.
- 7 g. R&K may have selected the site.
- 7 h. There was no charge to dump at the Sites when R&K used them.
- 7k & l. The refuse is believed to have been landfilled.
- 7 o. Disposal was free. Transport price is unknown.

SUCCESSOR 104
see Estes-chart.

Wesnovtek Corporation
31000 Telegraph Rd., Suite 150
Bingham Farms, MI 49025

Wesnovtek did not exist from 1951 to 1981.
The manufacturing facility located at 4500
Detroit Ave., Toledo, OH 43612 was owned
and operated by Dura Corporation from 1922

104(e) - Kidde

to 1966, when Kidde, Inc. purchased Dura's stock and formed a wholly-owned subsidiary of Kidde, also called Dura Corporation, which then operated the facility until 1982. Kidde is the responsible party for all dumping at the Sites from 1951 through 1982, since they assumed the liabilities of Dura Corporation. Since 1982, Dura has gone through a series of business asset sales to various entities, the last of which to operate the Detroit Avenue facility was Dura Mechanical Components, Inc. who sold the facility to The Four L's in 1992. Any pertinent records which may exist would be in the possession of either Wickes Mfg. Company of Charlotte, N.C. or Dura Mechanical Components, Inc., Troy, MI. Following are Kidde, Inc. contacts: Paul T. Sullivan, Esq., Treanor, Harvey & Sullivan, Montclair, NJ; Ms. Terrance Faye, Pittsburgh, PA.

SKIP For Now.

Yenkin-Majestic Paint Corporation
1920 Leonard Avenue
Columbus, OH 43236-9004
and:
6538 West Central Avenue
Toledo, OH 43617

Mark Hollinger, Operations Mgr. of Y-M
replies to both letters. They have no
specific information to provide re the Sites.
The Toledo address is a separate retail store
that sells their product along with others.
It first opened for business in 1988.

Earl Scheib of Ohio, Inc
2221 North Detroit Avenue
Toledo, OH 43612

1. Jeff Pearl, an employee in respondent's Springfield, MO facility represented by the respondents attorney.
2. Records are not maintained for the period in question.
3. None.
4. None.
5. None.
6. None.
7. No hazardous materials. Garbage etc. was disposed of by the City of Toledo.
 - a. see 7
 - b. none
 - c. trade secret see attachment
 - d. did not arrange for transport of hazardous substances to site
 - e. trade secret see attachment
 - f. trade secret see attachment
 - g. see 7d
 - h. none
 - i. see 7d
 - j. see 7h
 - k. none
 - l. see 7h & 7k
 - m. see 7d & 7h
 - n. see 7d & 7c
 - o. none
 - p. none
 - q. see 1 & 3, none
8. see 7k

Have Frank ask Marowski about Shieh.

General Mills :
Ask for Sales agreement
showing liability transfer.

Graftmaster & Kenner Parker Toys, Inc.
Hasbro